

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY (NEWARK)	
RAS Crane, LLC 10700 Abbott's Bridge Road, Suite 170 Duluth, GA 30097 Telephone Number 470-321-7112 Attorneys For Secured Creditor Shauna Deluca, Esq. (SD-8248)	CASE NO.: 18-32111-RG CHAPTER 13 Objection to Confirmation of Debtor's Chapter 13 Plan
In Re: Georgina Paz, Debtor.	

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

U.S. Bank National Association, as Trustee for SPECIALTY UNDERWRITING AND RESIDENTIAL FINANCE TRUST MORTGAGE LOAN ASSET-BACKED CERTIFICATES, SERIES 2007-BC1 ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Chapter 13 Plan (DE # 24), and states as follows:

1. Debtor, Georgina Paz ("Debtor"), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on November 6, 2018.
2. Secured Creditor holds a security interest in the Debtor's real property located at 530 North 5TH Street, Harrison, NJ 07029, by virtue of a Mortgage recorded on November 4, 2006 in Book 15081, at Page 72 of the Public Records of Hudson County, NJ. Said Mortgage secures a Note in the amount of \$210,000.00.
3. The Debtor filed a Chapter 13 Plan on December 21, 2018.
4. The Plan intends to pay-off Secured Creditor's loan in full, however the figures used by the Debtor are inaccurate. The Plan proposes to pay only \$1,917.00. Upon information and belief, the secured claim held by the first mortgage has an anticipated payoff of approximately \$423,308.93. If the Debtor's intent is to payoff Secured Creditor lien, Secured Creditor objects to any plan which proposes to pay it anything less than

\$423,308.93 as the total payoff, subject to the final figures in the anticipated proof of claim.

WHEREFORE, Secured Creditor respectfully requests this Court sustain the objections stated herein and deny confirmation of Debtor's Plan, and for such other and further relief as the Court may deem just and proper.

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CERTIFICATION OF SERVICE

1. I, Shauna Deluca, represent U.S. Bank National Association, as Trustee for SPECIALTY UNDERWRITING AND RESIDENTIAL FINANCE TRUST MORTGAGE LOAN ASSET-BACKED CERTIFICATES, SERIES 2007-BC1 in this matter.
2. On November 1, 2019, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below: Objection to Confirmation of Plan.
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

November 1, 2019

RAS Crane, LLC
Attorney for Secured Creditor
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Shauna Deluca, Esquire
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<u>Name and Address of Party Served</u>	<u>Relationship of Party to the Case</u>	<u>Mode of Service</u>
Albert Luis Lancellotti Albert L. Lancellotti, LLC 74 Bruen Street Newark, NJ 07105	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing(NEF) <input type="checkbox"/> Other (as authorized by the court*)
Georgina Paz 530 N. 5th Street Harrison, NJ 07029	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)
Marie-Ann Greenberg Chapter 13 Standing Trustee 30 Two Bridges Rd Suite 330 Fairfield, NJ 07004	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing(NEF) <input type="checkbox"/> Other (as authorized by the court*)
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing(NEF) <input type="checkbox"/> Other (as authorized by the court*)